Remarks

In the Office Action, claims 1-34 have been rejected by the present Office Action. After entry of the present amendment, claims 1 - 34 remain pending in the application. The present amendment amends independent claims 1, 11, 30, 33, and dependent claims 12 - 18, 31, and 34 to clarify the scope of the claimed inventions. Reconsideration of the application in view of the present amendment and following remarks is respectfully requested.

Claim Rejections Under 35 U.S.C. § 112

Claims 31 was rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the claimed invention. The present amendment amends claim 31, and the rejection under 35 U.S.C. §112 is believed to be traversed.

Claim Rejections Under 35 U.S.C. § 101

Claims 33 and 34 were rejected under 35 U.S.C. §101 on the grounds that the claimed invention is allegedly directed to two non-statutory subject matters. Claim 34 was rejected under 35 U.S.C. §101 on the grounds that the claimed invention is allegedly directed to non-functional data. The present amendment amends claims 33 and 34, and the rejections under 35 U.S.C. §101 are believed to be traversed.

Claim Rejection Under 35 U.S.C. § 103

Claims 1-9, 11, 30, and 32-34 were rejected under 35 U.S.C. 103(a) as being unpatentable over Walker, U.S. Patent No. 5,794,207 ("*Walker*"), in view of Fielder, U.S. Patent Application No. 5,995,624 ("*Fielder*"). By the present amendment, independent claims 1, 11, 30, 33 have been amended to clarify the scope of the claimed inventions. For example, claim 1 has been amended to include the element, "using said identification received from said first party to retrieve data that is related to said second party and material to said transaction, wherein the alias is generated upon matching an account number associated with a portion of an account application submitted by the second party with an account number associated with an existing

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account of the second party...." (Underlining supplied). Independent claims 11, 30, and 30 have been similarly amended. The Office Action admits that *Walker* does not disclose "wherein the alias is generated upon matching an account number associated with a portion of an account application with an account number associated with an existing account ...."; however, the Office Action alleges that *Fielder* discloses that element.

Certain embodiments of the Applicants' claimed inventions relate to protecting the anonymity of an account holder or applicant, when part 1 of a credit application 104 goes to a different location than a part 2 security stub 106, and the only information in common between the two parts of the credit application are the DTNs (document tracking numbers) 108 and 110. *See* paragraph [0097]. Security information from the part 2 security stub 106 can be used to assign a password to an alias account, wherein the password is used for identification verification on the alias account. *See* paragraph [0103]. Since part 1 of the credit application 104 and part 2 security stub 106 share an associated DTN, the DTNs can be used to construct a relationship between a primary account and the alias account. *Id.* However, *Fielder* does not relate to "wherein the alias is generated upon matching an account number associated with a portion of an account application with an account number associated with an existing account ...." Instead, *Fielder* appears to relate to using a combination of authentication and encryption in which parameters are used to produce one-time use, pseudo-random passwords and encryption keys. The *Fielder* methodology is not applied by *Fielder* to generating an alias upon matching an account number associated with a portion of an account application with an account number associated with an existing account, as in the Applicants' claimed invention.

Even the cited combination of *Walker* and *Fielder* appears to be limited to providing a buyer or seller with a user identification or ID without authenticating the identity of the buyer or seller, and only authenticates the user identification or ID when a buyer or seller transaction is facilitated. As explained in the prior response, *Walker* only attempts to authenticate a buyer or seller's identity when the user identification or ID is matched against user identifications or IDs in a database, and not prior to the use of or providing the user identification or ID. *Walker*, Col. 8, line 66 – Col. 9, line 8. *Fielder* is generally concerned with secure exchange of information rather than protecting the anonymity of a buyer or seller in a transaction. *See* Col. 2, lines 54+,

Abstract, and Claims. Instead of any practical application of any authentication and encryption methodology to buyer or seller transaction processing, *Fielder* appears to focus on an encryption technique that purports to be highly resistant to cryptographic analysis and brute force trial-and-error attacks. Col. 4, lines 7-14. For at least these reasons, the cited combination of *Walker* and *Fielder* does not teach or suggest at least the element "wherein the alias is generated upon matching an account number associated with a portion of an account application with an account number associated with an existing account ...."

Claims 12-16 and 18 were rejected under U.S.C. 103(a) as being unpatentable over *Walker* and *Fielder* and in further view of Breck, et al., U.S. Patent Publication No. 2004/0158532 A1 ("*Breck*"). *Breck* appears to have an earliest priority date of March 7, 2000, which is several months after the earliest priority claim of the Applicants' application. *Breck* is believed to be ineligible as prior art reference against the present application. For at least this reason, dependent claims 12-16, and 18 are believed to be allowable over the cited reasons.
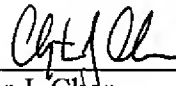
Further, claim 17 was rejected under 35 U.S.C. 103(a) as being unpatentable over *Walker*, *Fielder*, and U.S. Patent No. 5,950,179 to Buchannan ("*Buchannan*"). *Buchannan* appears to relate to issuing a credit card to a consumer who has problems qualifying for unsecured credit or a secured credit card. *Buchannan* does not relate to accommodating anonymous transactions between two or more parties. Since dependent claim 17 is ultimately dependent from at least independent claim 11, for which arguments of patentability have been provided above. If the underlying independent claims are allowable over the cited references, the corresponding dependent claims should also be in condition for allowance.

In addition, claims 10, 19-29, and 31 were rejected under U.S.C. 103(a) as being unpatentable over *Walker* and *Fielder*, in further view of Ginter, U.S. Patent No. 6,237,786 B1 ("*Ginter*"). *Ginter* appears to relate to secure, automated transaction processing for use in electronic commerce. *Ginter* does not relate to accommodating anonymous transactions between two or more parties. Since dependent claims 10, 19-29, and 31 are ultimately dependent from at least independent claims 1, 11, and 30, for which arguments of patentability have been provided above. If the underlying independent claims are allowable over the cited references, the corresponding dependent claims should also be in condition for allowance.

CONCLUSION

It is not believed that extensions of time or fees for addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 19-5029.

Respectfully submitted,

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